

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

GINA KOSS,

Plaintiff,

v.

PORTFOLIO RECOVERY  
ASSOCIATES, LLC,

Defendant.

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CASE NO. 20-1912

**NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that on this date, Defendant Portfolio Recovery Associates, LLC hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Allegheny County, Pennsylvania and in support thereof avers as follows:

1. Portfolio Recovery Associates, LLC is a defendant in a civil action originally filed on August 28, 2020 in the Court of Common Pleas of Allegheny County, Pennsylvania titled *Gina Koss v. Portfolio Recovery Associates, LLC* and docketed to Case No. GD-20-004046.

2. The removal is timely under 28 U.S.C. § 1446(b). PRA received service of Plaintiff's Complaint by certified mail on November 9, 2020.

3. Pursuant to 28 U.S.C. § 1446, attached here as Exhibit A are copies of all process, pleadings, and orders filed in the state court action.

4. The District Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against PRA alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

5. On this date, PRA has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Allegheny County, Pennsylvania.

WHEREFORE, Defendant Portfolio Recovery Associates, LLC respectfully removes this case to the United States District Court for the Western District of Pennsylvania.

Respectfully submitted,

**MESSER STRICKLER, LTD.**

By: /s/ Lauren M. Burnette  
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*Counsel for Defendant*

Dated: December 9, 2020

**CERTIFICATE OF SERVICE**

I certify that on December 9, 2020, a true copy of the foregoing document was served as follows:

*Via E-mail and U.S. Mail Postage Prepaid*

Joshua P. Ward  
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*Counsel for Plaintiff*

*Via Electronic Filing*

Court of Common Pleas  
Allegheny County  
414 Grant St.  
Pittsburgh, PA 15219

**MESSER STRICKLER, LTD.**

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*Counsel for Defendant*

Dated: December 9, 2020